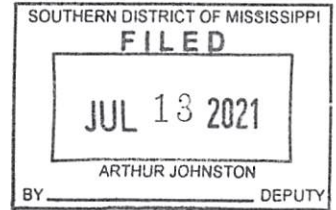


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:21 CR 70 HTW-LGI*

TIMOTHY DANIEL STEELE  
a/k/a Timothy Daniel Gantenbein

18 U.S.C. § 2252(a)(2) & (b)(1)  
18 U.S.C. § 2252(a)(4)(B) & (b)(2)

**The Grand Jury charges:**

COUNT 1

On or about January 30, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly receive and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, specifically: the defendant, using an Apple iPhone 11, received via the Internet and interstate or foreign commerce, at least one visual depiction the defendant then knew was a visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct and was of such conduct as defined in Title 18, United States Code, Section 2256.

All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 2

On or about May 8, 2017, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly receive and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, specifically: the defendant, using an Apple iPhone 11, received via the Internet and interstate or foreign commerce, at least one visual depiction the defendant then knew was a visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct and was of such conduct as defined in Title 18, United States Code, Section 2256.

All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 3

On or about February 8, 2018, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly receive and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct,

specifically: the defendant, using an Apple iPhone 11, received via the Internet and interstate or foreign commerce, at least one visual depiction the defendant then knew was a visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct and was of such conduct as defined in Title 18, United States Code, Section 2256.

All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 4

On or about May 6, 2020, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly receive and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, specifically: the defendant, using an Apple iPhone 11, received via the Internet and interstate or foreign commerce, at least one visual depiction the defendant then knew was a visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct and was of such conduct as defined in Title 18, United States Code, Section 2256.

All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 5

On or about July 6, 2020, in Rankin County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly receive and attempted to receive one or more visual depictions using a means and facility of interstate and foreign commerce, and which visual depictions had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so shipped and transported, by any means, including by computer, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depictions were of such conduct, specifically: the defendant, using an Apple iPhone 11, received via the Internet and interstate or foreign commerce, at least one visual depiction the defendant then knew was a visual depiction, the production of which involved the use of a minor engaged in sexually explicit conduct and was of such conduct as defined in Title 18, United States Code, Section 2256.

All in violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).

COUNT 6

On or about November 9, 2020, in Rankin County in the Northern Division, of the Southern District of Mississippi, and elsewhere, the defendant, **TIMOTHY DANIEL STEELE a/k/a Timothy Daniel Gantenbein**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed an Apple iPhone 11, to include a prepubescent

minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct, and was of such conduct, as defined in Title 18, United States Code, Section, 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offenses as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

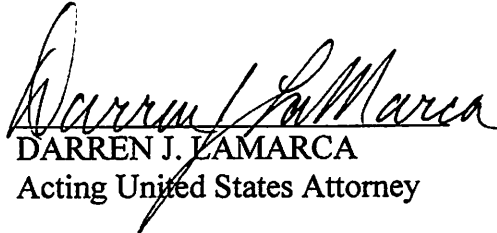
The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of the offenses alleged in this indictment:

- (1) An Apple iPhone 11;
- (2) An Apple iPod in red case;
- (3) Motorola cell phone;
- (4) Samsung cell phone;
- (5) Seagate external hard drive; and
- (6) An Apple iPhone cell phone.

Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other

property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice of any bill of particulars supporting it.

All in pursuant to Title 18, United States Code, Section 2253.

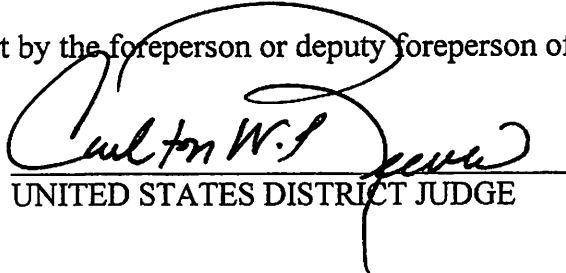
  
DARREN J. LAMARCA  
Acting United States Attorney

A TRUE BILL:

S/SIGNATURE REDACTED

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on the 13<sup>th</sup> day of July, 2021.

  
UNITED STATES DISTRICT JUDGE